

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LLOYD C. HILL, JR. a single man,

Plaintiff,

v.

KING COUNTY, a Washington municipal  
corporation, *et al.*,

Defendants.

Case No. 2:23-cv-00771-RSM

SECOND STIPULATED MOTION FOR  
ORDER CONTINUING DEADLINE FOR  
FILING MOTIONS RELATED TO  
DISCOVERY

**I. RELIEF REQUESTED**

Plaintiffs and Defendants hereby submit this second stipulated motion for entry of an order continuing the deadline for parties to file motions related to discovery for two weeks, from June 30, 2025, to July 14, 2025. In support of this motion, the parties jointly submit the following to the Court:

1. On November 19, 2024, the Court entered its Order on the parties' stipulated motion, establishing June 16, 2025, as the deadline for the parties to file motions related to discovery. Dkt. #32.

2. On June 17, 2025, the Court granted the parties' first stipulated motion for an order extending the discovery motion deadline to June 30, 2025. Dkt. #41.

3. In this case, Plaintiff seeks recovery of money damages for an alleged incident that occurred at the King County Jail on December 24, 2020, which Plaintiff alleges resulted in serious personal injuries (the "alleged incident"). Several King County corrections officers who

1 were involved in the alleged incident are defendants in this action.

2 4. The parties have diligently pursued and participated in discovery. Both sides have  
3 propounded extensive written discovery and have produced voluminous documents in response  
4 to requests for production of documents. Numerous depositions have been taken. Written reports  
5 from both sides' experts have been timely exchanged.

6 5. Due to a shift in case assignments in the office of Defendants' counsel, new  
7 counsel for Defendants associated as attorneys for Defendants on May 28, 2025, just five weeks  
8 ago. *See* Dkt. #38. Other attorneys in the King County Office of the Prosecuting Attorney who  
9 previously were representing Defendants are no longer currently working on the case.  
10 Defendants' new attorneys have diligently been reviewing the facts and case issues.

11 6. The parties met and conferred on June 27, 2025, concerning the status of the few  
12 remaining issues pertaining to King County's responses to Plaintiff's written discovery. King  
13 County has agreed to produce without reservation records and documents responsive to all  
14 Plaintiff's remaining outstanding requests for production except for those in two categories that  
15 pertain to Plaintiff's prior incarceration and medical and mental health records. King County is  
16 attempting to learn whether documents and records concerning those issues that were available  
17 to King County on the date of the alleged incident exist in King County's records now, and  
18 whether and how they can be produced. If they exist and are in a form that can be produced to  
19 Plaintiff, King County intends to produce them. King County has not yet determined if the  
20 records currently exist in King County's records, and if they do, how they may be produced to  
21 Plaintiff, but expects to obtain that information on or shortly after June 30, 2025.

22 7. Without a short extension of the deadline for filing motions related to discovery,  
23 the parties will be required to devote important and finite resources to preparing a motion to  
24 compel discovery and to respond to the motion rather than continuing their efforts to resolve the

1 remaining issues cooperatively. The parties submit that they anticipate that if the Court grants  
 2 another two-week extension for the parties to file motions related to discovery, the parties will  
 3 be able to resolve all outstanding discovery issues without requiring motion practice before the  
 4 Court.

5 8. Wherefore, the parties jointly move and stipulate that the deadline for the parties  
 6 to file motions related to discovery be extended from June 30, 2025, to July 14, 2025.

7 SO STIPULATED on June 27, 2025.

8 ***Attorneys for Plaintiff:***

9 BERRY & BECKETT, PLLP

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**II. ORDER**

The Court having considered the foregoing stipulated motion, and finding that good cause has been shown for the requested relief, now therefore, FINDS and ORDERS that the deadline for the parties to file motions related to discovery is extended from June 30, 2025, to July 14, 2025.

DATED THIS 11<sup>th</sup> day of July, 2025.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE